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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No. 3:21-cr-00073-JMK-DMS
	)
Plaintiff,	) <u>COUNT 1:</u>
	) ARSON
vs.	) Vio. of 18 U.S.C. § 844(i)
	)
MARK CRUZ NYSTUEN,	) <u>COUNT 2:</u>
	) USE OF A DESTRUCTIVE IN
Defendant.	) FURTHERANCE OF A CRIME OF
	) VIOLENCE
	) Vio. of 18 U.S.C. § 924(c)(1)(A)(i)
	)
	) <u>COUNT 3:</u>
	) POSSESSION OF AN
	) UNREGISTERED DESTRUCTIVE
	) DEVICE
	) Vio. of 26 U.S.C. § 5861(d)
	)

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INDICTMENT

The Grand Jury charges that:

COUNT 1

On or about July 14, 2021, within the District of Alaska, the defendant, MARK CRUZ NYSTUEN, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosive, a building and other real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, to wit: an apartment located in Anchorage Alaska.

All of which is in violation of 18, U.S.C. § 844(i).

COUNT 2

On or about July 14, 2021, within the District of Alaska, the defendant, MARK CRUZ NYSTUEN, did knowingly possess a destructive device, to wit: a Molotov Cocktail, a firearm as defined in 18 U.S.C. § 921(a)(3)(D), in furtherance of the crime of violence alleged in Count 1 of this Indictment, and did use said destructive device during and in relation to this crime.

All of which is in violation of 18 U.S.C. § 924(c)(1)(A)(i).

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COUNT 3

On or about July 14, 2021, within the District of Alaska, the defendant, MARK CRUZ NYSTUEN, did knowingly possess a destructive device, to wit: a Molotov Cocktail, a firearm as defined in 26 U.S.C. § 5845(a)(8), which was not registered in the National Firearms Registration and Transfer Record.

All of which is in violation of 26 U.S.C. § 5861(d).

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Kayla Doyle  
KAYLA DOYLE  
Special Assistant United States Attorney  
United States of America

s/ E. Bryan Wilson  
E. BRYAN WILSON  
Acting United States Attorney  
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DATE: 7/22/21